

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 25-MJ-00058-SMM

FILED BY MB D.C.

Jun 11, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTP

UNITED STATES OF AMERICA,

v.

FRANCISCO FRANCISCO-MATEO,

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? **No.**
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? **No.**
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? **No.**
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? **No.**

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By:


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AO 91 (Rev. 11/11) Criminal Complaint

AUSA Christopher Hudock

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

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ANGELA E. NOBLE
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United States of America
v.
FRANCISCO FRANCISCO-MATEO,

Case No. 25-MJ-00058-SMM

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 26, 2025 in the county of Martin in the
Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 111(a)(1)	Resisting, opposing, impeding, or interfering with a federal officer. (misd.)

This criminal complaint is based on these facts:

-SEE ATTACHED AFFIDAVIT-

☒ Continued on the attached sheet.*Complainant's signature*

Angelo Zaravelis, Deportation Officer, ICE/DHS

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by videoconference.

Date: June 11, 2025*Judge's signature*City and state: Fort Pierce, Florida

Shaniek Mills Maynard, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Angelo Zaravelis, being duly sworn, depose and state as follows:

1. I am a Deportation Officer of the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), and have been employed in a similar capacity since 2007. I am currently assigned to Enforcement and Removal Operations, Criminal Alien Program, Stuart, Florida. As a Deportation Officer with ICE, my duties and responsibilities include enforcing criminal and administrative immigration laws of the United States.

2. This affidavit is based upon my own knowledge as well as information provided to me by other law enforcement officers. This affidavit does not set forth every fact known to me regarding the investigation but only those facts necessary to establish probable cause to believe that Francisco FRANCISCO-MATEO ("FRANCISCO-MATEO") committed the offense of assaulting, resisting, or impeding federal officers, in violation of Title 18, United States Code, Section 111(a)(1).

3. Florida Highway Patrol ("FHP") partnered with ICE and is part of the "287(g) program." This program delegates federal immigration enforcement authorities to state and local law enforcement agencies, pursuant to 8 U.S.C. 1357(g). FHP Trooper Petrofsky is a 287(g) Task Force Officer.

4. On May 26, 2025, FIIP Trooper Petrofsky conducted a traffic stop on a work truck labeled "CHOO MJM LAWN" in Martin County, Florida. Trooper Petrofsky identified himself to the three occupants and began conducting a commercial motor vehicle safety inspection. Trooper Petrofsky asked for identification from the three occupants, at which time the driver provided a temporary Florida driver license, and the front passenger provided a Guatemalan ID card. The passenger sitting on the passenger side of the rear seat, later identified as Francisco

FRANCISCO-MATEO, did not provide identification. All three occupants told Trooper Petrofsky that they are from Guatemala. Trooper Petrofsky contacted ICE Deportation Officer Andersson for assistance.

5. Deportation Officer Andersson arrived on scene and approached the passenger side of the truck, near Trooper Petrofsky. As Deportation Officer Andersson identified himself, FRANCISCO-MATEO removed his seat belt and quickly moved towards the rear driver side door. Believing that FRANCISCO-MATEO was trying to flee, Officer Andersson rushed around the front of the vehicle to stop FRANCISCO-MATEO. At that time, ICE Deportation Officer Blumsack arrived and covered the driver side of the vehicle. Deportation Officer Andersson returned to the passenger side of the vehicle.

6. Trooper Petrofsky repeatedly ordered FRANCISCO-MATEO to open the door and to come out of the vehicle. At first, FRANCISCO-MATEO kept the rear passenger door locked, and made several movements throughout the cabin. Then, FRANCISCO-MATEO unlocked the rear passenger door. As Trooper Petrofsky opened the door, FRANCISCO-MATEO moved away and tried to climb to the front driver side of the vehicle. Trooper Petrofsky entered the vehicle and physically removed FRANCISCO-MATEO.

7. As FRANCISCO-MATEO was removed from the vehicle, FRANCISCO-MATEO tried to flee. As officers attempted to gain physical control of him, FRANCISCO-MATEO continued to resist their lawful commands, and began swinging his elbows. The two deportation officers, trooper, and FRANCISCO-MATEO, all fell to the ground. FRANCISCO-MATEO continued to resist, despite several commands to "stop moving." While on the ground, FRANCISCO-MATEO bit Deportation Officer Andersson on his right forearm, breaking the skin and drawing blood, at which time Deportation Officer Andersson exclaimed, "He's biting me!"

8. Trooper Petrofsky stood up, created distance, and drew his taser as FRANCISCO-MATEO and both deportation officers returned to their feet. Then, Trooper Petrofsky deployed his taser, causing FRANCISCO-MATEO to fall back onto the ground. FRANCISCO-MATEO thwarted the officers' efforts to place him in handcuffs by trying to get back up onto his feet. Trooper Petrofsky deployed his taser again. FRANCISCO-MATEO continued to keep his hands tucked under his body. As officers gained control of FRANCISCO-MATEO's wrists, he grabbed the officer's handcuffs and held onto the officer's hand. The officers eventually placed FRANCISCO-MATEO in handcuffs after additional taser deployments, and placed him under arrest for violating immigration law.

9. As a result of the encounter, Deportation Officer Andersson suffered a bite wound on his right forearm and abrasions on both knees and shins. Deportation Officer Blumsack suffered a scratch on his right forearm and abrasions on his left wrist and left hand.

10. Based on the foregoing, I believe that there exists probable cause to believe that, on or about May 26, 2025, Francisco FRANCISCO-MATEO assaulted, resisted, or impeded federal officers, in violation of Title 18, United States Code, Section 111(a)(1).



Angelo Zaravelis
Deportation Officer
Immigration and Customs Enforcement

Subscribed and sworn to before me, by videoconference, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure, in Fort Pierce, Florida, this 11th day of June, 2025.



SHANIEK MILLS MAYNARD
UNITED STATES MAGISTRATE JUDGE